



CITIZENS COMMITTEE TO COMPLETE THE REFUGE

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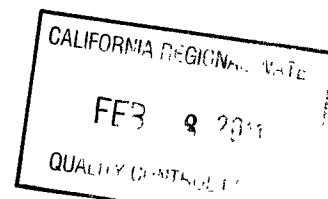
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RE: Comments on the Draft Environmental Impact Report for the Redwood City New General Plan
(May 10, 2010)

The Citizens Committee to Complete the Refuge (CCCR) thank you for this opportunity to comment on the New General Plan. We commend the City for its recognition of the need for and value of this update as the General Plan is the comprehensive long-term vision and policy that will guide future development in the City while safeguarding the quality of life and welfare of Redwood City residents. We commend the City for striving to "reduce dependence on motor vehicles and increase pedestrian, bicycle, and transit usage through appropriate land use and transportation planning."

A startling omission in this comprehensive blueprint that will guide and coordinate development within Redwood City's sphere of influence for the next twenty years is the 1436-acre Cargill salt pond site. The project description states:

In January 2009, in order to allow for a more comprehensive and in-depth study of the development options for this property, the City Council determined that any changes to the 1990 General Plan policies applicable to the Cargill Property should be considered and implemented in a separate *process for completion after the New General Plan process*. In May 2009, the City received an application from the project proponent for the development of this site, with a mix of residential, commercial, institutional, and open space/flood control uses. (emphasis added)

It is obvious a development project as massive as that proposed by Cargill and its partner DMB Associates would necessitate comprehensive and in-depth study of its own. What is incomprehensible is how a project of this magnitude could be purposefully omitted from the General Plan update. It is through the General Plan update process that the public and decision makers have the opportunity to review potential sites of development, assess the realm of alternative development possibilities for the City, assess the how the impacts each of those alternative development visions will influence the fabric of daily life for Redwood City residents, businesses, and the surrounding communities, and then come to the decision of what development vision best suits the needs of the City and its residents. Deferring consideration of the impacts of this massive development plan, one that the City has already received an application for, deprives the public and decision makers of a *comprehensive assessment* of the impacts of this development on other potential development proposals, on how the City will evolve, on each and every Redwood City resident and those in the surrounding communities. What is the real purpose of omitting the Cargill salt pond development proposal from consideration during the General Plan process?

In the New General Plan the Cargill site retains the same land use designations as the 1990 GP—which are open space land uses. Thus, the New GP continues to recognize the open space value of the salt ponds. The open space land uses and Tidal Plain zoning allow salt making and tidal marsh restoration, among others. We believe the DEIR for the NGP should analyze full restoration of the entire site to bay habitats in the alternatives analysis.

We say this because, while this site is of extreme importance to Bay health, it is also of great social value. In their response to scoping comments, staff stated that full restoration of this site is not included in the alternatives analysis because restoration is not expected to reduce impacts of the New GP. However, wetland restoration would provide more recreation, sequester greenhouse gases, and reduce flooding of existing neighborhoods – all impacts of the NGP. In addition, it would help meet the NGP Project Objectives of planning for sustainability within our finite resources including open space, water, energy, and air quality.

Staff also stated that including restoration of the site in the alternatives is not required as it is not “feasible”. However, the NGP and DEIR include a new streetcar system as a central transportation feature even though the NGP calls for “*studying the feasibility* of this system”. Whether the streetcars are feasible is totally unknown. But we do know wetland restoration **is feasible**. Just look at Bair Island and SBSP Restoration Project—huge restorations undertaken, not by cities, but by state and federal agencies. Lack of feasibility is not an argument for failing to include restoration as an alternative. What is the real reason for not including an alternative that includes full restoration of the entire Cargill salt pond site?

Most importantly, an alternative of restoration on the Cargill site is appropriate within the context of a general plan update as we determine what the vision for the City is now and in the future. The proposal for the development of these former baylands, in the path of sea level rise, will have profound effects on the City. The project will have 22 significant cumulative environmental impacts as the DEIR reports -- the project will effect Redwood City residents and the region and some of the impacts are direct threats to public safety e.g. flood hazard, seismic hazard. These threats pose future liabilities and costs to the residents of Redwood City. The analysis shows threats to the quality of life of RWC residents and the surrounding region - e.g. vistas of the baylands, traffic congestion, water, and air quality. The proposal for development is incompatible with existing surrounding uses. Why wouldn't these issues be appropriate for review and assessment under the comprehensive umbrella of the General Plan update?

An alternative that preserves and restores the Cargill salt ponds is consistent with evolving State climate change strategies. The 2009 California Climate Adaptation Strategy recommends the following:

Consider project alternatives that avoid *significant new development* in areas that *cannot be adequately protected* (planning, permitting, development, and building) from *flooding*, wildfire and erosion *due to climate change*. The most risk-averse approach for minimizing the adverse effects of sea level rise and storm activities is *to carefully consider new development within areas vulnerable to inundation* and erosion. *State agencies should generally not plan, develop, or build any new significant structure in a place where that structure will require significant protection from sea level rise, storm surges, or coastal erosion during the expected life of the structure*. However, vulnerable shoreline areas containing **existing** development that have regionally significant economic, cultural, or social value may have to be protected, and in-fill development in these areas may be accommodated. State agencies should incorporate this

policy into their decisions and other levels of government are also encouraged to do so. (CS-2; OCR-1 and 2; W-4 and 9; TEI -2 and 7)."[emphasis added]

An alternative that restores the 1436 acres of salt ponds avoids putting future Redwood City residents in harm's way and would allow the City to focus its attention on protecting existing residents and businesses that are already at risk. Why wouldn't this be beneficial for the residents of Redwood City?

The public should be given the opportunity to compare the impacts on our City of a New General Plan that envisions full restoration of the Cargill salt ponds versus the impacts of the same GP in which the Cargill site is developed with 8,000 to 12,000 new housing units, the impacts of which will be experienced by each of us as we go about our daily lives.

As an organization, our focus is the preservation and restoration of wetlands and watersheds for the benefit of the species they support, and for the health of the bay and its human residents. We are also committed to seeing the completion of the Don Edwards San Francisco Bay National Wildlife Refuge as protection of all the remaining lands within the Refuge Expansion Boundary will be necessary to preserve the biodiversity of the Central and South Bay. Specifically, the Citizens Committee is concerned with the fate of the 1,433-acre Cargill salt ponds, which were historically tidal salt marsh and are part of San Francisco Bay, and the treatment of this area in the GP DEIR. It is important to note that these ponds are completely within the congressionally-approved boundary of the Don Edwards National Wildlife Refuge and represent the opportunity to restore rare high marsh habitat to benefit water quality and species.

The Recovery Plan for the Pacific Coast Population of the Western Snowy Plover has indicated the Redwood City salt ponds would be an appropriate location for the recovery of this species.

The 1999 Goals Project states, "The Redwood City crystallizers and associated salt ponds offer the opportunity to maintain and enhance shorebird and waterfowl habitat in close proximity to the large tidal flats that are so important for foraging shorebirds. Creating salt pan habitat would provide nesting habitat for the snowy plover."

The 2001 "Feasibility Analysis South Bay Salt Pond Restoration San Francisco Estuary, California," prepared by Stuart W. Siegel and Dr. Philip Bachand, states, "Crystallizer ponds are *ready-made pannes* suitable for shorebird nesting and roosting habitat that *need comparatively little modifications*. The crystallizer ponds *address ecological needs for a variety of species*, especially the threatened western snowy plover, and they can be incorporated into early-phase restoration efforts." (emphasis added)

Core populations of the federally listed California clapper rail occur on Greco Island immediately adjacent to the Cargill salt ponds. Restoration of a portion of the 1436-acres to mid to lower range tidal marsh habitat provide a hedge against sea level rise for the Greco Island population.

Comments regarding the wording of proposed Goals and Policies the language we urge the City to incorporate is italicized:

GOAL BE-10 – Encourage the development of pedestrian- and water-oriented mixed-use communities that provide public accessibility to the Bay *and is compatible with wildlife preservation*.

Policy BE-10 Require that Waterfront Neighborhoods provide public access *in appropriate locations* along water edges, to public open space and trails, and to vista points as integral parts of neighborhood development *so long as they are compatible with wildlife preservation*.

Policy BE-21.3 – We do not believe a passenger ferry terminal is appropriate at the Port as it is not compatible with Port operations, would have significant adverse impacts on tidal marsh species including federally listed or protected species.

Policy BE-22.2 – New development should be avoided within the flood plain, especially since the existing flood events are expected to increase as sea level rises.

Program BE-3 – We commend the City for proposing annual review of lands susceptible to flooding as identified by flood plain mapping but encourage the City to incorporate review of how those lands are also affected by sea level rise as new information continues to be developed.

Policy BC-5.6 – Provide access to water-based recreation opportunities in San Francisco Bay and along bay front lands that is compatible with preservation of wildlife populations.

Policy NR-5.1 – Restore, maintain and enhance Redwood City's creeks, streams, and sloughs to preserve and protect plants, wildlife and associated habitats, *and where feasible, and not in conflict with the preservation of these resources*, incorporate public access.

Program NR-31 – Upland-Bayland Transition Zones. *Protect and maintain* upland-bayland transition zones *as they are necessary for* wildlife refuge during hightide events and flooding. *Develop* buffer zones between upland bayland transition zones and development. The importance of these areas as wildlife refuge is already established in the scientific literature and these areas are becoming more important as sea level rises and entire tidal marsh communities will have to migrate upslope or face extirpation.

We thank you for the opportunity to provide comments. We urge the City to incorporate the Cargill salt ponds into the General Plan Update. We urge the City to consider an alternative that includes full restoration of the 1436-acre salt pond site. Redwood City has the opportunity to lead the region by example in enlightened planning by preserving the edges of its interface with the bay. Tremendous opportunity seized or squandered?

Respectfully submitted by,



Florence LaRiviere,
Chairperson